

**LEVY KONIGSBERG LLP
ATTORNEYS AT LAW
605 THIRD AVENUE, 33RD FLOOR
NEW YORK, N.Y. 10158**

NEW JERSEY OFFICE
QUAKERBRIDGE EXECUTIVE OFFICE
101 GROVERS MILL ROAD
LAWRENCEVILLE, NJ 08648
TELEPHONE: (609) 720-0400
FAX: (609) 720-0457

**(212) 605-6200
FAX: (212) 605-6290
WWW.LEVYLAW.COM**

ATLANTA OFFICE
ONE GLENLAKE PARKWAY, SUITE 700
ATLANTA, GEORGIA 30328
TELEPHONE: (800) 315-3806
FAX: (212) 605-6290

WRITER'S DIRECT EMAIL: CSTERN@LEVYLAW.COM

MAY 31, 2023

VIA EMAIL (LESLIE CALHOUN@MIED.USCOURTS.GOV)

Honorable Judith E. Levy
United States District Court – Eastern District of Michigan Federal Building
200 East Liberty Street Ann Arbor, Michigan 48104

RE: IN RE FLINT WATER CASES – PRIVILEGE LOG CHALLENGES

Dear Judge Levy:

Plaintiffs write to address our March 23, 2023 challenge to Veolia's privilege log. Initially, because the underlying matter is a diversity action, "the court applies federal law to resolve work product claims and state law to resolve attorney-client claims." *In re Powerhouse Licensing, LLC*, 441 F.3d 467, 472 (6th Cir. 2006).¹ However, Michigan state courts "look[] to federal precedent for guidance in determining the scope of the attorney-client privilege when a particular issue has been addressed by a federal court," *Nash v. City of Grand Haven*, 321 Mich. App. 587, 594 (2017), and "federal law principles govern waiver," *Iafrate v. Warner Norcross & Judd, LLP*, 335 F.R.D. 378, 385 (E.D. Mich. 2020). Finally, "the burden of establishing the existence of the privilege rests with the person asserting it." *United States v. Dakota*, 197 F.3d 821, 825 (6th Cir. 1999).

¹ Case quotes are "cleaned up" throughout, i.e., internal quotation marks and citations are omitted in all case citation. In addition, alterations are indicated using ellipses and brackets.

Without state court or Sixth Circuit authority to support their position,² Veolia baselessly argues that their communications with third parties do not waive privilege. Thus, they have failed to meet their burden in establishing privilege. *Id.*

Meanwhile, applicable state and federal case law clearly establishes that “the attorney-client privilege is waived by voluntary disclosure of private communications by an individual or corporation to third parties.” *JPMorgan Chase & Co. v. Pierce*, No. 05-CV-74455-DT, 2007 U.S. Dist. LEXIS 25841, at *18 (E.D. Mich. Apr. 4, 2007); *Henry v. Quicken Loans, Inc.*, 263 F.R.D. 458, 466 (E.D. Mich. 2008) (“Generally, the attorney-client privilege is waived by voluntary disclosure of private communications by an individual or corporation to third parties.”); *Dyna Grind Servs. v. City of Riverview*, No. 255825, 2006 Mich. App. LEXIS 1545, at *28-29 (Ct. App. May 4, 2006) (“Once otherwise privileged information is disclosed to a third party ... the privilege disappears.”); *Oakland Cty. Prosecutor v. Dep’t of Corr.*, 222 Mich. App. 654, 658 (1997) (same).

Indeed, a court within this circuit, the Southern District of Ohio, has addressed the issue of waiver as it relates specifically to third party public relations consultants on multiple occasions. Each time, the Court consistently held that sharing information with third party public relations consultants destroys the privilege. *Waters v. Drake*, No. 2:14-cv-1704, 2015 U.S. Dist. LEXIS 164179, at *4 (S.D. Ohio Dec. 8, 2015) (“As this Court has observed in another case, it is ‘generally true’ that sharing attorney-client privileged communications with a public relations firm is a waiver of the privilege.”); *McNeil v. Mount Carmel Health Sys.*, No. 2:20-cv-258, 2021 U.S. Dist. LEXIS

² Instead, counsel for Veolia emailed authority from outside Michigan and the Sixth Circuit. Now, in their recent letter brief, they cite one state law case and imply that their consultants are covered by attorney client privilege because they are “functional equivalents” of Veolia’s employees. This new argument is as convenient as it is disingenuous. For months, Veolia has claimed they don’t even know who did what when it came to their public relations. They don’t know Jennifer Kaufmann’s role (Actum employee); they don’t know who Jennifer Wlach is (Actum employee); they don’t know who was Tweeting during trial; and they don’t know who was updating their “Facts From The Courtroom” link on their website. But now, whoever they are, they are Veolia’s ostensible agents? The Court should dismiss this argument on its face.

217302, at *18 (S.D. Ohio Nov. 10, 2021) (“The Court notes that, at least to the extent those communications were with an outside public relations firm, it is generally true that disclosure of otherwise privileged documents to a public relations firm is a waiver of the privilege.”); *DRFP, LLC v. Republica Bolivariana de Venez.*, No. 2:04-cv-793, 2015 U.S. Dist. LEXIS 141788, at *5-6 (S.D. Ohio Oct. 19, 2015) (“[T]o the extent [a PR firm] was performing public relations functions, its participation in attorney-client communications resulted in a waiver — even if those functions were related to the various litigations in which [the client] was embroiled.”).

But even if the Court finds that Veolia’s inclusion of third-party public relations consultants does not invalidate attorney client or attorney work product privilege, their privilege assertions are *still improper*, insofar as the underlying communications and documents do not seek or relate to legal advice. Rather, they relate to Veolia’s public relations strategy and therefore are not covered by attorney client privilege or attorney work product.

Under Michigan law, attorney client privilege is “narrow” and only applies to communications “that are made for the purpose of obtaining legal advice.” *Reed Dairy Farm v. Consumers Powers Co.*, 227 Mich. App. 614, 618-19 (1998). Courts in this Circuit, including the Eastern District of Michigan, have ruled that communications between an attorney and third-party public relations consultants are *not protected* by the attorney client privilege when the purpose of the communication is not for assisting counsel in providing legal advice,³ but rather for crafting a public relations campaign. *Waters*, 2015 U.S. Dist. LEXIS 164179 at *4-6; *Flagg v. City of Detroit & Kwame M. Kilpatrick*, No. 05-74253, 2010 U.S. Dist. LEXIS 164312, at *5 (E.D. Mich. Oct. 15, 2010) (“When an attorney is consulted in a capacity other than as a lawyer, as (for example) a policy advisor, media expert, business consultant, banker, referee or friend, that consultation is not

³ “[L]egal advice involves the interpretation and application of legal principles to guide future conduct or to assess past conduct.” *Alomari v. Ohio Dep’t of Pub. Safety*, 626 F. App’x 558, 570 (6th Cir. 2015) (citation omitted).

privileged.”). This is because “case law makes clear that a media campaign is not a litigation strategy.” *Waters*, 2015 U.S. Dist. LEXIS 164179 at *6.

The same is true for communications between Veolia’s non-attorney employees and third-party consultants wherein an attorney is either copied on or forwarded the communication. Veolia ***cannot transform*** these non-privileged communications about media strategy into privileged communications by forwarding or copying an attorney on the communication. For the communication to be privileged, the attorney’s inclusion ***must be*** to ask them for legal advice. *McNeil*, 2021 U.S. Dist. LEXIS 217302 at *18 (holding that “[m]erely sending a proposed media strategy to an attorney” is not sufficient to establish privilege); *Waters*, 2015 U.S. Dist. LEXIS 164179 at *11 (“[W]here the dominant purpose of such communications is not to secure legal advice or information requested by counsel, but to make some type of policy or business decision, the communication cannot be insulated from discovery just by sending a copy of it to a lawyer.”).

Nor should Veolia be permitted to make ***false privilege assertions*** to shield non-privileged documents. Although Veolia sometimes asserts (in their privilege log) that an attorney’s inclusion on a communication was for “legal advice and review,” Plaintiffs doubt the veracity of these assertions – and with good reason. Attached is a document Veolia provided in their April 28, 2023 production. *See* Exhibit 1, VWNAOS552937. This document corresponds to a privilege log entry that describes the basis for privilege as: “Communication regarding Frank Ferrara’s legal advice and review of VNA’s draft media statement concerning Flint.” *See* Exhibit 2, Sheet 1 Row No. 98. But a review of the document shows that the privilege assertion was false (as the communication did not actually include legal advice from Frank Ferrara), and that Veolia employees copied lawyers just to “protect” the communication. *See* Exhibit 1, VWNAOS552937 (Paul Whitmore: “Should I send this to Tarrah? [I’d] [sic] have to send to Frank and CC to protect us[.]”).

The same reasoning described above applies to Veolia’s assertions of attorney work product. Because the “driving force” behind these documents is public relations, they are not

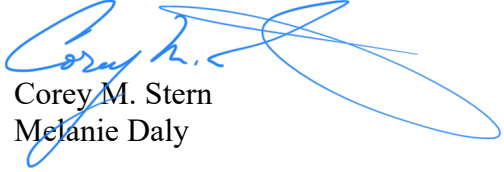
properly withheld as attorney work product. *United States v. Roxworthy*, 457 F.3d 590, 595 (6th Cir. 2006); *McNeil*, , 2021 U.S. Dist. LEXIS 217302, at *13 (ruling that documents that concerned “responding to media inquiries” and “managing social media” were not attorney work product because although “those same non-litigation purposes may have important legal implications for Defendants, they remain implications, and not the driving force behind the preparation of each requested document[.]”); *Schnatter v. 247 Grp., LLC*, No. 3:20-CV-00003-BJB-CHL, 2021 U.S. Dist. LEXIS 208324, at *28 (W.D. Ky. Oct. 28, 2021) (“[T]he Court concludes that the driving force behind creating the [] Report and related documents and communications was to serve a public relations function and not to assist with litigation.”).

Finally, the Veolia Defendants’ handling of their privilege log and the challenges thereto has been inconsistent and purposefully vague. This includes their recent attempts to supplement the privilege log for the Court with additional information not included on their original log, and disclosures of one version of a document while inexplicably maintaining privilege over another version of the same document. This conduct warrants a finding of waiver. *See Henry v. Quicken Loans, Inc.*, 263 F.R.D. 458, 465 (E.D. Mich. 2008) (“The law is clear that the attorney-client privilege can be waived by conduct such as partial disclosures which would make it unfair for a client to invoke the privilege elsewhere.”); *Star Lodge LLC v. Endurance Am. Specialty Ins. Co.*, No. 2:19-cv-10905, 2020 U.S. Dist. LEXIS 248137, at *14 (E.D. Mich. Nov. 10, 2020) (“Where the information provided by [Defendant] is inadequate, the claimed privilege has been waived.”).

As the Court knows well from having presided over the first bellwether trial, documents are a tremendous piece of the foundation for the parties’ claims and defenses. Some documents bolster and others weaken positions. But fairness and the integrity of our judicial system requires transparency in production, which to date has not occurred as it pertains to the Veolia Defendants. We strenuously urge the Court to require the Veolia Defendants to act with more transparency in their production and to produce the documents requested in Plaintiffs March 23 correspondence.

Sincerely,

LEVY KONIGSBERG, LLP



Corey M. Stern
Melanie Daly

Attorneys for the Plaintiffs

EXHIBIT 1

From: Karole Colangelo <karole.colangelo@veolia.com>
Sent: Thursday, June 23, 2016 6:42 AM -05:00
To: Whitmore, Paul <paul.whitmore@veolia.com>

Karole Colangelo, 2016-06-23 04:42:54

How are you holding up?

Whitmore, Paul, 2016-06-23 04:43:48

I'm OK. I'm tired but hanging in there. Happy for all of this comms support here as I feel more hands will spread the work out a bit.

Karole Colangelo, 2016-06-23 04:44:34

Yes...

Karole Colangelo, 2016-06-23 06:11:30

do we have a fact sheet?

Karole Colangelo, 2016-06-23 06:11:38

or a start to one?

Whitmore, Paul, 2016-06-23 06:12:10

We have a basic timeline. AND we started an FAQ that went to Scott and then went nowhere. It's comprehensive and one page.

Whitmore, Paul, 2016-06-23 06:12:18

I can send it to you now to look at.

Karole Colangelo, 2016-06-23 06:12:22

yes, please

Whitmore, Paul, 2016-06-23 06:14:41

It's sensitive language but it's in your inbox. If you want to bring it up, it came about as the result of a conversation SAE had with Paris either in late March or early April.

Whitmore, Paul, 2016-06-23 06:31:16

Should I send this to Tarrah? I'd have to send to Frank and CC to protect us, but I can get it to her right now for review.

Whitmore, Paul, 2016-06-23 06:39:22

Sent it.

Karole Colangelo, 2016-06-23 06:42:14

that's fine.

Karole Colangelo, 2016-06-23 06:42:30

we need to move; too much chit chat

Whitmore, Paul, 2016-06-23 06:42:39

She's acknowledged. I agree.

Whitmore, Paul, 2016-06-23 06:43:01

From a process standpoint, Mercury is now leading with our support at the moment, yes?

Whitmore, Paul, 2016-06-23 08:07:11

Mercury is working the FAQ, yes? Or am I to do that and the Timeline?

Whitmore, Paul, 2016-06-23 08:07:23

The timeline is done, by the by.

Whitmore, Paul, 2016-06-23 08:09:16

For your initial review: https://veoliawater.box.com/s/

Karole Colangelo, 2016-06-23 08:14:17

can we share the final report?

Karole Colangelo, 2016-06-23 08:14:23

sent to ambrose?

Whitmore, Paul, 2016-06-23 08:14:42

Yes. It's posted on Flint's website so we can link or we can attach.

Whitmore, Paul, 2016-06-23 08:14:50

I have a copy somewheres....

Whitmore, Paul, 2016-06-23 08:14:59

And I'm culling all of the FAQ comments now.

Karole Colangelo, 2016-06-23 08:21:15

I think we need to include a line date for when our contract was complete.

Whitmore, Paul, 2016-06-23 08:21:43

Ok. I'll add it.

Whitmore, Paul, 2016-06-23 09:48:08

I have the document open and will take a look at what comes from the lawyers, add it and get it to you for final look before it gets sent again.

Karole Colangelo, 2016-06-23 09:48:25

ok. did you add bill's sentence?

Whitmore, Paul, 2016-06-23 09:49:57

Yes. We made a series of recommendations and they were ignored.

Karole Colangelo, 2016-06-23 09:50:20

"by city officials"

Karole Colangelo, 2016-06-23 09:51:26

never mind. don't add city officials

Whitmore, Paul, 2016-06-23 09:53:04

Ok. I've taken it out.

Karole Colangelo, 2016-06-23 09:53:31

having fun, yet?

Whitmore, Paul, 2016-06-23 09:53:41

Actually, no.

Karole Colangelo, 2016-06-23 09:53:51

glad the outside pr counsel gets to take the responsibility

Whitmore, Paul, 2016-06-23 09:53:56

Yes.

Whitmore, Paul, 2016-06-23 09:54:15

That's what I'm most happy about right now. Perhaps all that I'm happy about....

Karole Colangelo, 2016-06-23 09:54:23

me too....

Whitmore, Paul, 2016-06-23 10:24:03

Wow.

Karole Colangelo, 2016-06-23 10:26:10

it will be interesting to see what happens next....

Whitmore, Paul, 2016-06-23 10:27:01

I'd like to think Bill is aware that this is what Rob prepared and will override everybody and say "do it."

Karole Colangelo, 2016-06-23 10:27:16

yep

Whitmore, Paul, 2016-06-23 10:27:37

Tarrah will be like WTF....

Whitmore, Paul, 2016-06-23 10:27:43

Welcome to Veolia, Tarrah.

Karole Colangelo, 2016-06-23 10:27:48

☺

Whitmore, Paul, 2016-06-23 10:31:19

☺

Karole Colangelo, 2016-06-23 10:31:25

☺

Karole Colangelo, 2016-06-23 10:31:28

HA!

Whitmore, Paul, 2016-06-23 10:32:18

At this point, it should be "We have no comments and this is approved." If Tarrah makes edits, this goes back for another hour of review.

Karole Colangelo, 2016-06-23 10:32:47

It's Paris's consultant....

Whitmore, Paul, 2016-06-23 10:33:07

Ah. True!

Karole Colangelo, 2016-06-23 10:48:05

was terreh going to send me the final?

Whitmore, Paul, 2016-06-23 10:48:33

She didn't say, I don't think

Whitmore, Paul, 2016-06-23 10:48:41

Oh. Yes. She did actually.

Karole Colangelo, 2016-06-23 11:31:02

paul, can you make sure the final statement is in the folder?

Whitmore, Paul, 2016-06-23 11:33:28

Yes. So when you go to the Flint root folder, there's one folder called 2016-Lead Issue ACTIVE FOLDER.

Whitmore, Paul, 2016-06-23 11:33:42

Everything is in there, neatly organized. There's a media response folder.

Whitmore, Paul, 2016-06-23 11:43:35

No ringing phones or emails yet...

Whitmore, Paul, 2016-06-23 11:43:40

The calm before the proverbial storm.

Karole Colangelo, 2016-06-23 11:43:59

LOL. Yeah, I'm just confirming with matt that it's out.

Whitmore, Paul, 2016-06-23 11:44:58

And Tarrah is taking it to those people on her list too? Or will this essentially reach all of those folks as well?

Karole Colangelo, 2016-06-23 11:45:35

US NewsWire One is basically all major media outlets. Then, they plan to call all outlets

Whitmore, Paul, 2016-06-23 11:45:54

Ok. Gotcha!

Whitmore, Paul, 2016-06-23 11:46:55

I have this fantastic vision in my head of your car ride to TN today...mobile office in the back, Chris just cruisin' down the highway. It made me smile, though I'm sure it's not the easiest thing to do....

Karole Colangelo, 2016-06-23 11:47:30

it's funny... he had to bring me lunch because I was on the phone...

Karole Colangelo, 2016-06-23 11:47:46

I'm very high maintenance today

Karole Colangelo, 2016-06-23 12:37:37

having fun, yet?

Whitmore, Paul, 2016-06-23 12:38:12

Indeed! Just sent the release to those folks on the list. So.....

Karole Colangelo, 2016-06-23 12:38:31

this is like a weird PR experiment...

Karole Colangelo, 2016-06-23 12:39:11

i just hope we're not used as a case study at some PR course about what not to do.

Whitmore, Paul, 2016-06-23 12:39:50

I guess we'll see! It would be a good case study though, in how to manage something like this with multiple attorneys and PR people involved.

Karole Colangelo, 2016-06-23 12:40:45

☺

Karole Colangelo, 2016-06-23 13:52:06

Quiet?

Whitmore, Paul, 2016-06-23 13:53:44

Two follow ups. One tv and one print. Forwarded on to Tarrah.

Whitmore, Paul, 2016-06-23 13:53:50

Otherwise yes.

Karole Colangelo, 2016-06-23 13:55:58

OK.

Karole Colangelo, 2016-06-23 13:56:14

I'm ready for a cocktail

Whitmore, Paul, 2016-06-23 13:59:24

Yes.

Whitmore, Paul, 2016-06-23 14:22:57

Isn't Mercury doing the media follow ups on our behalf?

Karole Colangelo, 2016-06-23 14:38:54

Sent a message to her

Whitmore, Paul, 2016-06-23 14:39:37

Thank you. Thought I misunderstood something.

EXHIBIT 2

[illegible]

SHEET 1

[illegible]

[illegible]

SHEET 1

SHEET 1

Date		Time		Location		Activity		Remarks	
1	2023-01-01	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Introduction to Algebra	
2	2023-01-02	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Linear Equations	
3	2023-01-03	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Quadratic Equations	
4	2023-01-04	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Polynomial Equations	
5	2023-01-05	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Factoring	
6	2023-01-06	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Graphing	
7	2023-01-07	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Word Problems	
8	2023-01-08	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Systems of Equations	
9	2023-01-09	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Matrices	
10	2023-01-10	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Determinants	
11	2023-01-11	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Inverse Matrices	
12	2023-01-12	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
13	2023-01-13	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Eigenvalues	
14	2023-01-14	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Eigenvectors	
15	2023-01-15	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
16	2023-01-16	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
17	2023-01-17	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
18	2023-01-18	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
19	2023-01-19	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
20	2023-01-20	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
21	2023-01-21	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
22	2023-01-22	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
23	2023-01-23	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
24	2023-01-24	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
25	2023-01-25	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
26	2023-01-26	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
27	2023-01-27	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
28	2023-01-28	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
29	2023-01-29	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
30	2023-01-30	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
31	2023-01-31	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
32	2023-02-01	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
33	2023-02-02	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
34	2023-02-03	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
35	2023-02-04	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
36	2023-02-05	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
37	2023-02-06	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
38	2023-02-07	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
39	2023-02-08	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
40	2023-02-09	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
41	2023-02-10	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
42	2023-02-11	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
43	2023-02-12	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
44	2023-02-13	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
45	2023-02-14	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
46	2023-02-15	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
47	2023-02-16	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
48	2023-02-17	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
49	2023-02-18	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
50	2023-02-19	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
51	2023-02-20	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
52	2023-02-21	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
53	2023-02-22	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
54	2023-02-23	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
55	2023-02-24	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
56	2023-02-25	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
57	2023-02-26	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
58	2023-02-27	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
59	2023-02-28	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
60	2023-03-01	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
61	2023-03-02	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
62	2023-03-03	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
63	2023-03-04	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
64	2023-03-05	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
65	2023-03-06	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
66	2023-03-07	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
67	2023-03-08	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
68	2023-03-09	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
69	2023-03-10	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
70	2023-03-11	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
71	2023-03-12	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
72	2023-03-13	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
73	2023-03-14	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
74	2023-03-15	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
75	2023-03-16	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
76	2023-03-17	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
77	2023-03-18	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
78	2023-03-19	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
79	2023-03-20	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
80	2023-03-21	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
81	2023-03-22	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
82	2023-03-23	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
83	2023-03-24	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
84	2023-03-25	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
85	2023-03-26	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
86	2023-03-27	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
87	2023-03-28	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
88	2023-03-29	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
89	2023-03-30	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
90	2023-03-31	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
91	2023-04-01	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
92	2023-04-02	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
93	2023-04-03	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
94	2023-04-04	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
95	2023-04-05	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
96	2023-04-06	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
97	2023-04-07	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
98	2023-04-08	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
99	2023-04-09	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	
100	2023-04-10	08:00	09:00	Room 101	Classroom	Mathematics	Algebra	Diagonalization	

[illegible]

Project Name	Project Manager	Project Sponsor	Project Description	Project Status	Project Start Date	Project End Date	Project Budget	Project Risk	Project Impact	Project Deliverables	Project Milestones	Project Dependencies	Project Risks	Project Issues	Project Comments
Project A	John Doe	Jane Smith	Project A Description	Completed	2023-01-01	2023-03-31	\$100,000	Low	High	Project A Deliverables	Project A Milestones	Project A Dependencies	Project A Risks	Project A Issues	Project A Comments
Project B	John Doe	Jane Smith	Project B Description	In Progress	2023-04-01	2023-06-30	\$200,000	Medium	Medium	Project B Deliverables	Project B Milestones	Project B Dependencies	Project B Risks	Project B Issues	Project B Comments
Project C	John Doe	Jane Smith	Project C Description	On Hold	2023-07-01	2023-09-30	\$150,000	High	Low	Project C Deliverables	Project C Milestones	Project C Dependencies	Project C Risks	Project C Issues	Project C Comments
Project D	John Doe	Jane Smith	Project D Description	Planned	2023-10-01	2023-12-31	\$300,000	Low	High	Project D Deliverables	Project D Milestones	Project D Dependencies	Project D Risks	Project D Issues	Project D Comments

[illegible]

[illegible]

Year	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078	2079	2080	2081	2082	2083	2084	2085	2086	2087	2088	2089	2090	2091	2092	2093	2094	2095	2096	2097	2098	2099	2100
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2001	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078	2079	2080	208																														

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	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
	Date	Author	Document	Reviewer	Description	Status	Comments	Comments	Comments	Comments	Comments	Comments	Comments	Comments	Comments	Comments	Reason for Challenge
1		Privileged	Vinla Narrative VA 07/11/2016.docx	Paul Whitham	Draft memorandum prepared at the direction of Rob Amundt analyzing VNA's recommendations to Flint and Frank's implementation of those recommendations generated in anticipation of litigation further so VNA defense against lawsuits that require it.	DOCS								VINOLA_0219-018	VINAGS0001-015	Campbell Prod	Third Party PR. Not for purposes of legal advice
2	7/15/16 11:06	Privileged	Safety statement VI safety.docx	Paul Whitham	Draft statement regarding Vinla's statements about water quality in Flint in light of and anticipation of pending litigation and prepared at the direction of counsel.	DOCS								VINOLA_0219-018	VINAGS0001-117	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
3	7/16/16 11:01	Privileged	Draft Statement on Vinla.docx	Paul Whitham	Draft statement regarding Vinla's work and lead testing in Flint in light of and anticipation of pending litigation and prepared at the direction of counsel.	DOCS								VINOLA_0219-018	VINAGS0001-116	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
4	7/16/16 12:01	Privileged	Vinla Work and Lead Testing v2.docx	Paul Whitham	Draft statement regarding Vinla's work and lead testing in Flint in light of and anticipation of pending litigation and prepared at the direction of counsel.	DOCS								VINOLA_0219-018	VINAGS0001-121	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
5	7/16/16 12:17	Privileged	Vinla Safety statement.docx	Paul Whitham	Draft statement regarding Vinla's statements about water quality in Flint in light of and anticipation of pending litigation and prepared at the direction of counsel.	DOCS								VINOLA_0219-018	VINAGS0001-122	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
6	7/16/16 12:19	Privileged	Vinla work and lead testing.docx	Paul Whitham	Draft statement regarding Vinla's work and lead testing in Flint in light of and anticipation of pending litigation and prepared at the direction of counsel.	DOCS								VINOLA_0219-018	VINAGS0001-123	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
7	7/16/16 16:28	Privileged	Vinla Narrative v3.docx	Paul Whitham	Draft memorandum regarding Vinla's work in Flint in light of and anticipation of pending litigation and prepared at the direction of counsel.	DOCS								VINOLA_0219-018	VINAGS0001-124	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
8	7/16/16 17:07	Privileged	Vinla Key Message Points - Unblinded Version 07/16/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-125	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
9	07/16/16 17:17	Privileged	Vinla Key Message Points - Unblinded Version 07/16/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-126	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
		Privileged	Vinla work and lead testingV3.docx	Paul Whitham	Draft memorandum prepared at the direction of Rob Amundt analyzing VNA's recommendations to Flint and Frank's implementation of those recommendations generated in anticipation of litigation further so VNA defense against lawsuits that require it.	DOCS								VINOLA_0219-018	VINAGS0001-127	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
11	07/20/2016 10:00 P M	Privileged	Media Q&A_06/30/16.docx	Paul Whitham	Draft memorandum regarding Vinla media in Flint.	DOCS								VINOLA_0219-018	VINAGS0001-128	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
12	07/20/2016 10:00 P M	Privileged	Vinla work and lead testing docV3.docx	Paul Whitham	The Midway draft statement regarding Vinla's work and lead testing in Flint in light of and anticipation of pending litigation.	DOCS								VINOLA_0219-018	VINAGS0001-129	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
13	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-130	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
14	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-131	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
15	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-132	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
16	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-133	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
17	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-134	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
18	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-135	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
19	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-136	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
20	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-137	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
21	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-138	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
22	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-139	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
23	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-140	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
24	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-141	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
25	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-142	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
26	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-143	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
27	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-144	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
28	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-145	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
29	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-146	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
30	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-147	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
31	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-148	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
32	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-149	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
33	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-150	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
34	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-151	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
35	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-152	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
36	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-153	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
37	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-154	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
38	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-155	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
39	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-156	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
40	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-157	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
41	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-158	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
42	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-159	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
43	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-160	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
44	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-161	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
45	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-162	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
46	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-163	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
47	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-164	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
48	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-165	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
49	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-166	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
50	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-167	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
51	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-168	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
52	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-169	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
53	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-170	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
54	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-171	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
55	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-172	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
56	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-173	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
57	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-174	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
58	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-175	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
59	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-176	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
60	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-177	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
61	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-178	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
62	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/21/16.docx (1) docx	Paul Whitham	Draft key messages regarding VNA's assessment in Flint prepared at the direction of counsel and in anticipation of litigation.	DOCS								VINOLA_0219-018	VINAGS0001-179	Campbell Prod	No attorney on the communication. Third Party PR. Not for purposes of legal advice
63	07/21/16 07:17	Unprivileged	Vinla Key Message Points - Unblinded Version 07/2														